

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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KAYLA REED,

Plaintiff,

-V-

Civ. No.: 2:17-cv-05713-ADS-GRB

1-800 FLOWERS.COM, INC.,

Defendant.

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**DECLARATION OF JOSEPH J. LYNELL, ESQ. IN FURTHER SUPPORT  
OF DEFENDANT'S MOTION TO DISMISS**

**JOSEPH J. LYNELL, ESQ.**, an attorney in good standing admitted to practice before this Court, hereby affirms that the following is true and correct:

1. I am a principal of the law firm of Jackson Lewis P.C., counsel to the Defendant herein, 1-800 Flowers.com, Inc., in the above-captioned action. I am duly licensed to practice law in the State of New York. I submit this declaration in support of Defendant's Motion to Dismiss Plaintiff's Complaint.

2. Attached as Exhibit "A" is a list of recent lawsuits filed by Plaintiff in New York federal courts and in California state courts.

3. Based upon the arguments advanced in Defendant's Reply Memorandum of Law In Further Support of Its Motion to Dismiss the Complaint and upon the exhibit attached hereto, it is respectfully submitted that Defendant's Motion to Dismiss the Complaint should be granted in its entirety, dismissing Plaintiffs' Complaint, and granting such other and further relief as this Court deems just and proper.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 29, 2017

Respectfully submitted,

By: /s/ Joseph J. Lynett  
Joseph J. Lynett  
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